

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<p>JOHN DOE, said name being fictitious,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>DELAWARE VALLEY REGIONAL HIGH SCHOOL BOARD OF EDUCATION, SCOTT MCKINNEY, individually and in his official capacity as Superintendent of Schools, ASHLEY MIRANDA, individually and in her official capacity as school counselor, MATTHEW J. PLATKIN, in his official capacity as Attorney General of the State of New Jersey, ANGELICA ALLEN-McMILLAN, in her official capacity as Acting Commissioner of the New Jersey Department of Education, and JOHN ROES 1-10 (said names being fictitious), individually and in their official capacities,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil No.</p> <p>SUPPLEMENTAL DECLARATION OF JOHN DOE IN SUPPORT OF APPLICATION FOR AN ORDER TO SHOW CAUSE.</p>
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JOHN DOE (said name being fictitious), of full age, hereby declares the following under penalty of perjury:

1. I am the plaintiff in this matter and the father of Jane Doe (“Jane”) (said name being fictitious). I make this Declaration pursuant to *Fed. R. Civ. P.* 65 (b)(1)(A)-(B).
2. Since my Verified Complaint was filed, events continue to evolve and demonstrate that the Delaware Valley Regional High School (“DVRHS”) defendants will not yield in their efforts to violate my rights as a parent of my daughter, Jane Doe (said name being fictitious).
3. First, by way of background, on January 3, 2024, my life partner who is raising Jane with me received a phone call from DVRHS advising that our choices with respect to Jane, since we did not want her in the school being socially transitioned in violation of my rights, were either to send Jane to school after hours for one on one instruction, or to send Jane to a place such

as the local public library where she would be instructed. We were advised that in either case, the District would continue to socially transition Jane and call her by a boy's name.

4. The Verified Complaint was filed January 5, 2024, and I am aware that my legal counsel emailed a copy to the attorney for DVRHS that same evening.

5. Attached hereto as **Exhibit A** is a letter, dated January 8, 2024, sent to DVRHS' attorney on my behalf which was accompanied by a note from Jane's pediatric group's Certified Nurse Practitioner requesting at home instruction for Jane due to mental health concerns.

6. During the time that Jane was out of the school and at home, she became a changed person. She became more engaged in the family, she stopped shutting herself in her room and being secretive, and she became much more visibly happy. She was no longer leading a double life which, with the encouragement and support of DVRHS and its staff, was being hidden from us. During the time of her "double life," Jane would shut herself in her room, was disengaged from the family, and was noticeably depressed.

7. On January 18, 2024, my attorneys received a response from DVRHS's attorneys, a true copy of which is attached hereto as **Exhibit B**. DVRHS insisted that Jane do her "at home" schooling on school premises after school on a 1:1 basis with a staff member. Unspoken was the obvious fact that DVRHS was going to continue socially transitioning Jane. Further, Jane was threatened with truancy if she did not comply.

8. Attached hereto as **Exhibit C** is a true copy of my attorneys' letter to DVRHS' attorney, also dated January 18, 2024, rejecting the 1:1 learning proposition and noting that the problem was not that Jane needed to be isolated from students, but rather, that Jane needed to be kept away from the predatory staff and administration that continued insisting on socially

transitioning Jane in violation of my parental rights, and contrary to the medical and clinical therapeutic treatment Jane had been receiving since 2022.

9. On January 20, 2024, two workers from the Department of Children and Families, Division of Child Protection, visited my home and began inquiring about Jane for a well check and to make sure that she was okay. They obviously had been sent there by DVRHS. I was forced to explain the situation to the workers, including that we had filed a lawsuit to seek an injunction against the school's efforts due to DVRHS compelling Jane's social transition. The workers indicated that they were very satisfied with the manner in which I was handling the situation and protecting Jane. The business card of one of the workers is attached hereto as **Exhibit D**.

10. On January 25, 2024, DVRHS' attorney responded that *it* was offended by our attorney's letter, insisting that it was doing the right thing by Jane, and ignoring that the DVRHS defendants have been trampling my parental rights. Further, they sought a more specific note from Jane's healthcare provider. A true copy of the letter is attached hereto as **Exhibit E**.

11. Attached hereto as **Exhibit F** is a true copy of a letter from Jane's Pediatrics Group Certified Professional Nurse Practitioner requesting at home instruction due to anxiety and depression which is exacerbated by the emotional strain and stress in her educational setting.

I hereby declare the foregoing to be true and correct based on my personal knowledge under penalty of perjury under the laws of the United States of America.

"John Doe"

Dated: February 2, 2024